

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

SIX-DAY TO FIVE-DAY CARRIER DELIVERY
AND RELATED SERVICE CHANGES, 2010

Docket No. N2010-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS PULCRANO
TO PUBLIC REPRESENTATIVE INTERROGATORY
(PR/USPS-T1-8)

The United States Postal Service hereby provides the response of witness Pulcrano to the above-listed interrogatory of the Public Representative dated May 7, 2010. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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May 27, 2010

**RESPONSE OF UNITED STATES POSTAL SERVICE PULCRANO
TO INTERROGATORY OF PUBLIC REPRESENTATIVE**

PR/USPS-T1-8. Please refer to your response to DFC/USPS-T1-1. Please provide further explanation and all available analyses supporting your conclusion that it would be “relatively costly and operationally inefficient to transport and process” only mail from collection boxes at or near post offices on Saturdays.

RESPONSE

The initial operating concept of the Five-Day Delivery Team included no Saturday collection and processing of regular single-piece mail deposited in collection boxes at or near Post Offices. In anticipation of the possibility of requests from senders and recipients for the Saturday collection and processing of such mail, the Five-Day Team estimated what the annual cost would be adding back the Saturday collection, transportation and processing of mail from collection boxes at or near Post Offices. The Team indicated that Saturday collection, transportation and processing of such mail would have to be operated as it is now. In addition, Saturday transportation between plants and Post Offices would have to be continued. I was informed that the annual cost to preserve such Saturday operations would be roughly \$600 million. See USPS-T-7, and the responses to interrogatories DFC/USPS-T6-1, DFC/USPS-T2-3 and DBP/USPS-T-2-1. Instead, if mail deposited in the subject collection boxes on Saturdays is collected, transported and processed along with Monday collection mail, efficiencies could be achieved by virtue of the combined Saturday/Monday mail volume being collected, transported and processed together on Monday.

**RESPONSE OF UNITED STATES POSTAL SERVICE PULCRANO
TO INTERROGATORY OF PUBLIC REPRESENTATIVE**

RESPONSE to PR/USPS-T1-8 (Continued)

When we were informed that the Postal Service's qualitative market research ultimately showed (a) that consumers and small businesses had no significant issues with the elimination of Saturday collection, transportation and processing of single-piece collection mail and (b) generally indicated that they would adapt, it was decided not to amend the operating plan to add back in Saturday pickup, transportation and processing of collection mail on Saturday.